

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF ALABAMA**  
**SOUTHERN DIVISION**

IN RE: COMMUNITY HEALTH	)	
SYSTEMS, INC.,	)	
CUSTOMER SECURITY DATA	)	
BREACH LITIGATION	)	
(MDL 2595)	)	
	)	MASTER FILE NO.
	)	15-CV-222-KOB
	)	
	)	This document relates to all cases.
	)	

**MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION**  
**SETTLEMENT AND CERTIFICATION OF SETTLEMENT CLASS**

Plaintiffs, by and through the undersigned counsel, hereby move this Court for an order pursuant to Rule 23 of the Federal Rules of Civil Procedure: (1) preliminarily approving the proposed settlement (a copy of the Settlement Agreement between the parties is attached to the accompanying brief as Exhibit A); (2) certifying the proposed settlement class; and (3) approving the proposed notice program. Plaintiffs request that the motion, which Community Health Systems does not oppose, be granted, because the settlement meets all of the standards for preliminary approval; the settlement class satisfies the requirements of Rule 23; and the notice program comports with both Rule 23 and due process.

This motion is based on the accompanying memorandum, exhibits, and the records, pleadings, and papers filed in this action, and such argument as may be

presented to the Court at the hearing on December 17, 2018.

Filed: December 10, 2018

Respectfully Submitted,

*s/ Karen H. Riebel*

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